

EXHIBIT D

DECLARATION OF MATTHEW OBERDICK

I, Matthew Oberdick, declare the following based on my personal knowledge.

1. I am the Director of External Relations at the Oklahoma State Department of Education (“OSDE”).
2. Achille is a city within the State of Oklahoma and maintains an Independent Public School District (ISD) that operates under the guidance and administration of the OSDE and the State Superintendent of Public Instruction, Ryan Walters.
3. I previously received a notification from Rick Beene, Superintendent at APS, regarding a letter he received from Freedom From Religion Foundation (“FFRF”) regarding an alleged contact from a “concerned parent.”
4. Superintendent Beene provided a copy of the FFRF letter to me. The letter indicated that FFRF was contacted regarding student-led prayer at Achille Elementary School and use of the Bible by a teacher at Achille High School.
5. Superintendent Beene explained the following, as described in Paragraphs 6-12:
6. On or about December 17, 2024, APS received a letter from FFRF regarding what it described as “unconstitutional school-sponsored prayer and bible [sic] readings.”
7. In this letter, FFRF stated that “the District must cease permitting instructors to teach students Bible verses, and it must end its schools’ practice of beginning each day with school-sponsored student-led prayers.”
8. As a part of the regular class day, a student is chosen to lead morning announcements at Achille Elementary School. Consistent with 70 O.S. § 11-101.1 and 11-101.2,

morning announcements include a moment of silence in which students may “reflect, meditate, or pray.”

9. On occasion, a student will voluntarily, and of his or her own accord, say a prayer during the moment of silence. No teacher, administrator, or staff member requires any student to lead a prayer, nor does any teacher, administrator, or staff member compel or coerce any student to participate in student-led prayer.
10. In keeping with Superintendent Walters’s directive that the Bible may be used as a teaching tool and for its secular value, a teacher at Achille High School used biblical texts as part of his history lessons; however, the Bible was not used for religious purposes.
11. At no time has any student ever been compelled or coerced to lead any APS school in prayer, nor has any student been forced or coerced to participate in any mandatory prayer.
12. At no time is any student compelled or coerced to read from the Bible, nor is the Bible used for any purpose other than its historical, secular value as a teaching resource.

I declare, under penalty of perjury, that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed this 31st day of March 2025.

(Signatures to follow on the next page)

Matthew Oberdick

Mr. Matthew Oberdick
Director of External Relations
Oklahoma State Department of
Education
2500 N. Lincoln Blvd.
Oklahoma City, OK 73105

SWORN AND SUBSCRIBED TO BEFORE ME THIS 31 DAY OF March,
2025.

K. Queen McDaniel
Notary Public

My Commission Expires: 8/16/2026

Commission Number: 24010366

